

Hon. Chairwoman Corinne Pierog and Members of the Kane County Board
719 Batavia Ave – Building A, 4th Fl
Geneva IL 60134

Via email

February 23rd, 2024

RE: Request for a Motion to Reconsider Petition 4616

Dear Chairwoman Pierog and Members of the County Board,

Thank you for your continued attention to Petition 4616. With this letter, we are requesting that the Board consider proposing and adopting a motion to reconsider Petition 4616 at its next regularly scheduled meeting on February 27, 2024.

We will not discuss the substance of the petition in this letter, but we must clearly communicate our intention to imminently file a lawsuit with respect to the February 13th denial of Petition 4616 based on the County's violation of 55 ILCS 5/5-12020 as well as other governing law in connection with its handling of the petition.

However, there is a way to avoid this imminent litigation. If the Board proposes and adopts a motion to reconsider the petition at its February 27th meeting, then all parties involved – petitioner, objectors and the County – can continue to try to arrive at a mutually-agreeable compromise that avoids litigation.

Please understand that to work on a compromise, the Board need only adopt a motion to reconsider (a procedural motion made by one of the 12 members who voted against the petition on February 13th) at the meeting. The Board need not – nor are we requesting that the Board – substantively re-consider the petition or hold another substantive vote on it. We are only asking for more time for all parties to continue to work on the matter before the imminent commencement of litigation.

Thank you for your consideration of this this matter.

Sincerely,



Joe Borkowski

Managing Director

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